

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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EDGEWOOD HIGH SCHOOL  
OF THE SACRED HEART, INC.,  
Plaintiff,

v.

CITY OF MADISON, WISCONSIN;  
CITY OF MADISON ZONING BOARD  
OF APPEALS; CITY OF MADISON  
PLAN COMMISSION; CITY OF  
MADISON COMMON COUNCIL; Zoning  
Administrator MATTHEW TUCKER, in  
his official capacity; Director of Madison's  
Building Inspection Division GEORGE  
HANK, in his official capacity; Alder TAG  
EVERS, in his official capacity,  
Defendants.

Case No. 3:21-CV-118

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**DECLARATION OF SARAH A. ZYLSTRA**

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I, Sarah A. Zylstra, under penalty of perjury, declare as follows:

1. I am an attorney representing the Defendants in the above-reference matter. I offer this declaration in support of Defendants' motion for to extend the stay of discovery.

2. Attached to this Declaration as Exhibit A is a true and correct copy of Plaintiff Edgewood High School of the Sacred Heart, Inc.'s Requests for Admission to All Defendants dated November 2, 2021.

3. Attached to this Declaration as Exhibit B is a true and correct copy of Plaintiff Edgewood High School of the Sacred Heart, Inc.'s Interrogatories to All Defendants dated November 2, 2021.

4. Attached to this Declaration as Exhibit C is a true and correct copy of Plaintiff Edgewood High School of the Sacred Heart, Inc.'s Requests for Production of Documents to All Defendants dated November 2, 2021.

5. Prior to filing the motion to extend the stay of discovery, I conferred with Plaintiff's counsel, Paul Covalleski, who informed me that Plaintiff opposed the motion.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this 12th day of November, 2021.

/s/ Sarah A. Zylstra  
Sarah A. Zylstra

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